

February 5, 2020

Chief Judge Pamela Pepper
United States Courthouse Room 208
517 East Wisconsin Avenue
Milwaukee, WI 53202

Re: *United States of America v. Todd Dyer*
Case No. 1:19-cv-01319-PP

Dear Chief Judge Pepper:

I have become aware of the Court setting the date of April 13, 2020 at 1:30 p.m. for the Motion Hearing regarding the above referenced matter. I was out of town last week so this is the first chance that I have been able to respond as I have also have been in a trial the first 2 days of this week.

I have reached out to one of my key witnesses, Attorney Thomas Santarelli, and he has indicated to me that he will be out of his office from April 6, 2020 – April 17, 2020 and he will be in trial the week of May 11, 2020. From Mr. Dyer's standpoint, this gentleman is a key witness in the sense that he will be able to talk about the legitimacy of the lawsuits that Mr. Dyer has either been involved in or allegedly has been involved in, one of the key areas of proof in this request for Injunctive Relief.

If the Court does agree to let us obtain a date that is suitable for our calendars, the AUSA and I can have a conversation with your Scheduling Clerk to come up with a day that works for all the parties and have their input accordingly.

Thank you very much for any consideration.

Respectfully Submitted:
Penegor & Lowenberg Law Offices

/s/ Robert J. Penegor

BY: ROBERT J. PENEGOR
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